



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking into the Review
of the California High Cost Fund B Program

Rulemaking 06-06-028

FURTHER COMMENTS OF PACIFIC BELL TELEPHONE COMPANY D/B/A AT&T CALIFORNIA (U 1001 C); AT&T ADVANCED SOLUTIONS, INC. (U 6346 C); AT&T COMMUNICATIONS OF CALIFORNIA (U 5002 C); TCG SAN FRANCISCO (U 5454 C); TCG LOS ANGELES, INC. (U 5462 C); TCG SAN DIEGO (U 5389 C); AND AT&T MOBILITY LLC (NEW CINGULAR WIRELESS PCS, LLC (U 3060 C); CAGAL CELLULAR COMMUNICATIONS (U 3021 C); SANTA BARBARA CELLULAR SYSTEMS LTD. (U 3015 C); AND VISALIA CELLULAR TELEPHONE COMPANY (U 3014 C)) ON FEBRUARY 7, 2008 WORKSHOP ISSUES

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February 19, 2008

Pursuant to the directive of Administrative Law Judge Pulsifer,¹ AT&T² hereby provides further comments on the workshop issues addressed on February 7, 2008. As the Commission gets farther in setting the parameters of the CASF, AT&T notes that the Commission's goals of furthering broadband deployment in California will be hampered if potential broadband providers view the Commission's program as bringing too much regulation over a service not regulated by the Commission.

1) Description of Existing Infrastructure

The ACR proposed that each application include a description of the applicant's current broadband infrastructure within 100 miles of the proposed project. ACR, Att. B, p. 3. As AT&T explained at the workshop, we do not feel this is necessary and actually burdens the process. AT&T suggests that a description of adjacent broadband infrastructure is appropriate if that area will receive incidental benefit from the application.

2) The Shape File Requirement

The straw application asks the applicant to provide a "shape file (.shp)" showing the current service area and the boundaries of the specific area to be served. *Id.* As a confidential part of that Application, AT&T agrees that it is reasonable to provide a shape file for the proposed build area. As noted above, however, AT&T does not believe it is necessary to provide information on the provider's current broadband deployment. In addition to the fact the Commission has no jurisdiction over existing broadband services, the information changes so frequently that it will quickly be outdated.

¹ Workshop Transcript, February 7, 2008, p. 14.

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3) The Speed Requirement and Measurement

Regarding the discussion about measuring speed and the appropriate weighting, AT&T offers these further comments. First, 15 points is the appropriate weight. The focus of the funds should be to give service to unserved areas, and the current weighting does that. Second, as we and others described at the workshop, individual customer “average speed” cannot practically be measured. In addition, burst speeds (meaning, maximum potential speeds for a short time), are not indicative of the service that will generally be experienced. Broadband networks are designed to provide service up to certain speed levels on a regular basis under normal operating circumstances. For wireline telephone carriers, those speeds are represented by the engineered network capacity at the busy hour and can vary based on distance from central office or remote terminal. For cable companies, the maximum speeds are more dependent on the time of use, or the number of customers using the network at a given time. The speed achieved by a wireless broadband connection is most affected by the radio signal quality, as determined by distance from the tower, obstructions, and RF interference. In addition, for both wireline and wireless services, factors outside the carriers’ control also affect speed, such as the customer’s equipment, content provider capacity, and congestion issues within the internet. For all these reasons, carriers generally market broadband services by describing the “up to” speed of the service(s) they offer. AT&T suggests this “up to” speed that broadband providers advertise be used for the application (excluding “burst” speeds).

4) Projects with Some Overlap into a Served Area

As described by AT&T and Verizon at the workshop, it is possible that a proposed project to offer broadband to an unserved area will result in making broadband also available to an area already served by another broadband provider (an “underserved” area). For example, a

DSL broadband proposal would enable an entire distribution area, but a small part of that distribution area may already be served by cable broadband. Or a wireless broadband build out proposal may in part overlap an area where DSL is available. From a technology viewpoint such an overlap situation could not realistically be prevented, nor would it be in anybody's interest to do so. AT&T suggests that applications that include overlap be evaluated as unserved and that carriers pro-rate and exclude the cost that supports the customers in the area already served. Additionally, so the Commission first addresses unserved areas, AT&T suggests that at least 75% of the subscribers of the proposed project be unserved in this initial round of applications.

5) DIVCA's Definition of Housing Units Should Be Used for All Proposed Projects.

AT&T agrees that the funds-per-potential-customer is the most important variable to be considered in granting applications to build broadband projects, and supports the weighting of this factor with 50 points. It is essential that all applicants measure this in the same way so that all applications are fairly evaluated. AT&T recommends that the Commission use the definition of "household" used in D.07-03-014, Appendix D, footnote 2:

A household is a house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as a separate living quarters, or if vacant, intended for occupancy as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and that have direct access from outside the building or through a common hall. For vacant units, the criteria of separateness and direct access are applied to the intended occupants whenever possible

To the extent that an applicant's proposed service boundaries do not neatly align with Census block group boundaries, AT&T recommends that the Commission follow similar guidance to that given in D.07-03-014, Appendix D (*e.g.*, alternate geospatial areas).

6) Public Information Must Be Limited to a CBG List.

AT&T has opposed counter bids as they are counterproductive to generating initial bids. The Commission response was that application details would not be shared. In order for the counter bid to not have an unfair advantage, AT&T recommends that the only information publicly released is that an application has been submitted for certain CBGs. This way the second bidder must rely on their own product design to make their bid, not just trying to be a little better or extend a little further. AT&T reiterates that even the identity of the applicant should be withheld because it tips off others about speed, potential price, and potential cost of infrastructure.

7) Mechanics of Payment of CASF Matching Funds Needs Modification to Eliminate the 10% Hold Back.

The 10% hold back (ACR, Att. B, p. 9) until the project is completed is unnecessary and in essence raises the cost of the project. First, it is unnecessary because the successful applicants will have either satisfied the Commission of its financial viability or posted a performance bond. Withholding 10% is not needed, because the matching funds are paid only *after* the carrier completes each quarter of the project. Second, since it may take up to two years to build the broadband infrastructure, and the successful applicant had to build (and pay for) the broadband network, the retention of 10% becomes an unnecessary and additional cost. AT&T suggests there is no need for this retention provision.

8) The Price Calculation Needs Consistency.

AT&T agrees with the workshop suggestion that for scoring purposes only, it is appropriate to calculate a monthly rate per Mbps by spreading any required NRCs over 12 months. AT&T also suggests that the service(s) used to report the price correspond to the speeds reported in the application. AT&T does not agree that the one-year price commitment should be

a commitment to every individual customer. The price commitment should be to make the price available only during that first year, after which it can then be changed. This is necessary because we are talking about a point of time that is likely to end three and a half years after the application. Applicants will already have to put in a significant amount of “head room” to commit to prices that far in advance. Essentially extending it another year by requiring the price to be maintained if a customer signs up on the 360th day is counterproductive. Also, because there are so many variables that will affect the price, AT&T disagrees with the suggestion made by TURN and DRA that this variable be assigned more weight.

9) Geographical Authority from the Commission

AT&T understands the purpose of the Applicant having a CPCN, U-number, or CPCN application on file, even though broadband is not a service regulated by the Commission. However, carriers that have received operating authority may not have that authority throughout the state. There is no reason to preclude carriers with limited geographical authority from applying for projects throughout the state. In fact, because some of the technology to be used (*e.g.*, WiMax) is not limited like landline areas, such a requirement would needlessly inhibit applications. Again, this should not be an issue since broadband service is not a Commission-regulated public utility offering.

10) Priority to Unserved Territory

To reflect the priority given to unserved areas, several parties proposed that only applications for unserved areas be considered in the initial round of funding. Given the high cost expected to deploy in unserved areas, it is quite possible that much if not all of the CASF monies may be allocated in unserved areas. Because of the considerable engineering and administrative work required to prepare every application, AT&T proposes that the Commission process the

entire first round of applications, and then announce the amount of funds remaining. By having a separate, second round of funding, applicants may be more likely to focus on unserved areas during the first round.

11) Other Recommendations

AT&T suggests that the Commission parallel DIVCA with regard to the financial requirements. For example, only requiring a bond from applicants whose funding requests are approved; only requiring names of principal officers rather than officers and directors; not requiring income and other financial statements.

Dated at San Francisco, California, this 19th day of February 2008.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **FURTHER**

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service List in **R.06-06-028**, via e-mail, hand-delivery and/or first-class U.S. Mail.

Dated this 19th day of February 2008 at San Francisco, California.

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PROCEEDING: R0606028

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